

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOSEPH MANTHA, *on behalf of himself
and all others similarly situated,*

Plaintiff,

v.

QUOTEWIZARD.COM, LLC,

Defendant.

Civil Action No. 1:19-cv-12235-LTS

**DEFENDANT'S ASSENTED-TO MOTION FOR LEAVE TO FILE SUMMARY
JUDGMENT OPPOSITION DOCUMENTS/EXHIBITS UNDER SEAL**

Now comes Defendant QuoteWizard.com, LLC ("QuoteWizard") and hereby files this Motion for Leave to File under Seal the below referenced documents in support of its Opposition to Plaintiff Joseph Mantha's ("Mantha") Partial Motion for Summary Judgment.

QuoteWizard will file its Opposition and related papers on this date, August 4, 2021. QuoteWizard seeks leave to file under seal: (1) certain exhibits to its Opposition that the producing party has marked Confidential pursuant to the Parties' protective order; (2) QuoteWizard's Motion to Strike Exhibit 5 to Mantha's Partial Motion and the attachments thereto, as well as the exhibit to QuoteWizard's Motion to Strike, which contain or directly quote from records likewise marked Confidential; and (3) QuoteWizard's Response to Mantha's Statement of Facts, as Mantha filed the original/unredacted Statement under seal (*see* ECF No. 207).

All of the documents for which QuoteWizard seeks leave have been marked Confidential or include substantial quotations from documents marked Confidential (which therefore are not

to be filed on the public docket), or in the case of the Response to the Statement of Facts, were previously filed under seal.

Mantha's counsel has assented to QuoteWizard filing certain exhibits under seal and QuoteWizard has reciprocally assented to Mantha seeking the same relief for his confidential filings. Copies of the unredacted filings will be provided to Mantha's counsel contemporaneous with filing.

WHEREFORE, QuoteWizard respectfully requests an Order allowing it to file the designated Motion, attachment, Response, and exhibits under seal.

Respectfully submitted,

QuoteWizard.com, LLC,
By its attorneys,

/s/ Kevin P. Polansky
Kevin P. Polansky (BBO #667229)
kevin.polansky@nelsonmullins.com
Christine M. Kingston (BBO #682962)
christine.kingston@nelsonmullins.com
Nelson Mullins Riley & Scarborough LLP
One Financial Center, Suite 3500
Boston, MA 02111
(t) (617)-217-4700
(f) (617) 217-4710

Dated: August 4, 2021

LOCAL RULE 7.1 CERTIFICATION

I, Kevin P. Polansky, hereby certify that, by e-mails on July 31, 2021, Plaintiff's counsel and my office conferred in good faith regarding the issues raised by this Motion, and Plaintiff's counsel assented to QuoteWizard filing certain exhibits/documents under seal.

Dated: August 4, 2021

/s/ Kevin P. Polansky

CERTIFICATE OF SERVICE

I, Kevin P. Polansky, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

Dated: August 4, 2021

/s/ Kevin P. Polansky